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Formed in the State of PA
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ATTORNEY FOR MOVANT: ALLY CAPITAL

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NEW JERSEY
NEWARK DIVISION**

IN RE:	§	CASE NO. 22-16089-VFP
	§	
JONOTHAN FOREMAN, Debtor	§	CHAPTER 13
	§	
	§	Hearing date: February 16, 2023@10:00
	§	A.M.
	§	
	§	<u>NOTICE OF MOTION TO VACATE</u>
	§	<u>AUTOMATIC STAY</u>
	§	<u>WITH WAIVER OF RULE 4001(a)(3)</u>

TO:

Camille J Kassar
271 Route 46 West, Suite C-102
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Jonothan Foreman
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Marie-Ann Greenberg
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PLEASE TAKE NOTICE that on **Thursday, February 16, 2023 at 10:00 A.M.**, or as soon as the matter may be heard, the undersigned, attorneys for Secured Creditor **Ally Capital** its assignees and/or successors in interest, will move before the Honorable Vincent F. Papalia of the United States Bankruptcy Court, 50 Walnut Street, Newark, NJ 07102 for the entry of an *Order Vacating the Automatic Stay* with respect to Debtor's 2011 Mercedes-Benz GL-Class Utility 4D GL550 4WD 5.5L V8, V.I.N. 4JGBF8GE3BA738682, and allowing Ally Capital to continue or institute a repossession action, by reason of the Debtor's failure to make regular monthly payments to Ally Capital.

Respectfully Submitted,

Lavin, Cedrone, Graver, Boyd & DiSipio
Attorney for Movant

Dated : January 24, 2023

/s/ Regina Cohen

Regina Cohen